

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville DIVISION

Ebony Cosby

Plaintiff(s),

v.

Braden Property Management

Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.
Please attach additional sheets if necessary).

Civil Action No.: 3:23-cv-03
(To be assigned by Clerk of District Court)

CLERK'S OFFICE U.S. DISTRICT COURT
AT CHARLOTTESVILLE, VA
FILED

JAN 04 2023

LAURA A. AUSTIN, CLERK
BY: [Signature]
DEPUTY CLERK

COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number. Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name: Ebony Cosby

Address: 813 Ridge St Charlottesville, VA 22902

Telephone Number: 434-806-4547

b. Plaintiff No. 2

Name: _____

Address: _____

Telephone Number: _____

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: Braden Property Management
Address: 215 5th St SW Suite 100 Charlottesville, VA 22903

b. Defendant No. 2

Name: _____
Address: _____

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☒ Federal Question ☐ Diversity of Citizenship ☐ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

Discrimination

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: _____ State of Citizenship: _____

Plaintiff No. 2: _____ State of Citizenship: _____

Defendant No. 1: _____ State of Citizenship: _____

Defendant No. 2: _____ State of Citizenship: _____

Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached. ☐

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. On 10/24/2022 I contacted Braden Property Management via email about an add for a rental property 509 Paton St Charlottesville, Va. I asked Braden Property Management did they accept section 8 vouchers. They replied that they do not have any properties available that accept the vouchers at this time. I then replied with the law states that if you have 4 or more properties that you have to accept it. They replied "Correct, we are aware of this law. Braden Property Management represents multiple individual owners. We do not own the rental properties within our portfolio. The owner of 509 Paton Street does not own 4 or more properties." I then sent them a link to the law. They then replied "We have this same document and have reviewed it. Owners with four (4) or fewer properties are exempted from these requirements (see bottom of page 6 of document). As previously stated, we do not own our rental properties, just manage them on behalf of other owners. The owner of this home, and all the other currently available properties, are exempted as they own 4 or fewer properties." So I replied when I file a lawsuit for discrimination who do I name Braden Property Management or the owner? And their response was "We have discussed our rental criteria and application approval process with a lawyer. We are confident that we are following all laws, rules, and guidelines provided by all governing agencies. This is no longer a productive conversation and we will not be responding to any further correspondence."

Braden Property Management refuses to accept my section 8 voucher and that is discrimination because of source of funds. Braden Property Management is violated Virginia's Fair Housing Act.

Braden Property Management has humiliated, embarrassed and disrespected me to the point I don't want to continue my search for housing.

Braden Property Managment has several properties for rent but those properties do not accept the section eight voucher making the search for housing a hassle

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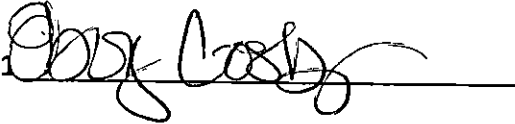
DEMAND FOR JURY TRIAL:

☒ YES

☐ NO

Signed this 4 day of Jan, 22.

Signature of Plaintiff No. 1



Signature of Plaintiff No. 2

NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.